

Fill in this information to identify the case:

Debtor 1 Eileen M. Bowers

Debtor 2
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of PA

Case number 22-11231 AMC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: MIDFIRST BANK

Court claim no. (if known): 6-2

Last 4 digits of any number you use to identify the debtor's account: 9328

Property address:

1630 Horace Court
Bensalem, PA 19020

Part 2: Prepetition Default Payments

Check one:

☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.

☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ 90,984.78

Part 3: Postpetition Mortgage Payment

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>959.80</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>1,170.00</u>
c. Total. Add lines a and b.	(c)	\$ <u>2,129.80</u>

Creditor asserts that the debtor(s) are contractually obligated for 06 / 01 / 2023 the postpetition payment(s) that first became due on:

Debtor(s) Eileen M. Bowers
First Name Middle Name Last Name

Case Number (if known): 22-11231 AMC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

*/s/ Denise Carlon

Date 06/29/2023

Denise Carlon
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 16106
215-627-1322
bkgroup@kmlawgroup.com
Attorney for Creditor



Your loan number and property address:

Loan # [REDACTED]
1630 HORACE CT
BENSALEM, PA 19020

January 6, 2023

EILEEN MARIE BOWERS
1630 HORACE CT
BENSALEM PA 19020-3802

Dear Homeowner:

At this time, your mortgage assistance plan is no longer active due to the reason(s) specified in the "Non-Approval Notice / Notice of Action Taken" included with this letter.

The following options are still available to help address your delinquency:

1. Call us at **1-800-552-3000** to reapply for a mortgage assistance program if your circumstances have changed.
2. Reinstate your loan by paying your delinquency in full.
3. Consider alternatives that may allow you to avoid foreclosure by transitioning to more affordable housing after you have explored and exhausted all available options to stay in your home; we may have programs to assist you.

You may also wish to seek further assistance from a HUD-approved housing counselor.

To locate a HUD-approved housing counselor near you, please contact the following:

HUD

1-800-569-4287 (or TTY 1-800-877-8339)

www.HUD.gov/findacounselor

Homeowner's HOPE™ Hotline

1-888-995-HOPE (4673)

www.hopenow.com

Additionally, your loan could be included in a Single Family Loan Sale Program as outlined by the Federal Housing Administration (FHA).

If you have any questions regarding program eligibility requirements or to reapply, please call us at **1-800-552-3000**. Our office hours are Monday through Friday 8 a.m. to 7 p.m. or Saturday 9 a.m. to 1 p.m. Central time.

Sincerely,

Mortgage Assistance Center

Midland Mortgage, a Division of MidFirst Bank

Enclosure(s)

Notice: If your loan was in default at the time MidFirst Bank obtained it, and you have not filed bankruptcy or received a discharge of the debt secured by the Mortgage/Deed of Trust, we are required to inform you that this communication is from a debt collector. If you have received a bankruptcy discharge of the debt secured by the Mortgage/Deed of Trust, or you are currently in bankruptcy under the protection of an automatic stay, this letter is not an attempt to collect the debt from you personally and is for informational purposes only.

The Federal Equal Credit Opportunity Act prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, or age (provided the applicant has the capacity to enter into a binding contract), because all or part of the applicant's income derives from any public assistance program, or because the applicant has in good faith exercised any right under the Consumer Credit Protection Act. The federal agency that administers compliance with this law concerning this creditor is: Consumer Financial Protection Bureau • 1700 G Street NW • Washington, DC 20006



Midland Mortgage: Mortgage Assistance Center

P.O. Box 268806 • Oklahoma City, OK 73126-8806 • Tel 1-800-552-3000 • Fax 1-405-767-5815 • www.MyMidlandMortgage.com

Qualified Written Requests, Notice of Errors, Information Requests, and Credit Disputes must be sent to:

P.O. Box 268959 • Oklahoma City, OK 73126-8959



Non-Approval Notice / Notice of Action Taken

Mortgagor	EILEEN MARIE BOWERS	Denial Date	01/06/23
Co-Mortgagor		Loan	
Mailing Address	1630 HORACE CT BENSALEM PA 19020-3802	Property Address	1630 HORACE CT BENSALEM PA 19020

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Escalations

If you believe your application for mortgage assistance has been denied due to an improper analysis of your information or in violation of HUD Loss Mitigation policies, you may submit a request in writing using the following methods below:

You can contact us by **fax** 1-405-767-5815 or **email** mac@midfirst.com or by **mail** at Midland Mortgage, P.O. Box 268806, Oklahoma City, OK 73126-8806.



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Reasons to Avoid Foreclosure

- Loss of your home and requirement to leave the premises
- Time and expense to find a new place to live
- Cost to rent in your area may be higher than your current mortgage payment (if you qualify for assistance, your monthly payment could be lower than it is today)
- Cash outlays, such as deposits, first and last months' rent, and other expenses typically associated with moving and renting
- Negative impact to your credit score that could last up to 7 years, and how this may affect various aspects of your life
 - Access to lines of credit could be more difficult
 - Interest rates offered to you for secured loans (such as auto loans) and unsecured loans (such as credit cards) may be higher
 - Insurance rates offered to you may be higher
 - Ability to rent a home or apartment may be more difficult
 - Ability to purchase a new home in the future may be more difficult
- Loss of any home equity earned to date

Transition to More Affordable Housing?

If you have explored and exhausted all available options to stay in your home, you may wish to consider transitioning to more affordable housing.

- Sell your home. The best way to transition to more affordable housing may be to sell your home and pay your home mortgage loan in full. This will allow you to avoid foreclosure.
- Pre-foreclosure sale. If you are unable to sell your home and pay the loan in full, you may qualify for a pre-foreclosure sale program. This program may allow you to avoid foreclosure by selling your home for an amount less than the total outstanding balance necessary to pay off your mortgage loan.

Call us at **1-800-552-3000** if you would like more information about the pre-foreclosure sale program.



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Loan # [REDACTED]
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Loan Number
Mortgagor EILEEN MARIE BOWERS
Case # 22-11231-13
Date 6/28/2023
Prepared By
Teller #

Transaction Date	Transaction Amount	Reference Number	Post Petition Date	Agreed Order Date	Transaction Type	Fee Detail	Transaction Detail	Suspense Amount
6/28/2022	1,006.00				SUSPENSE		1,006.00	1,006.00
6/29/2022	(1,006.00)				SUSPENSE		(1,006.00)	-
6/29/2022	1,006.00		6/1/2022		PAYMENT		1,005.06	-
6/29/2022					SUSPENSE		0.94	0.94
7/19/2022	1,006.00				SUSPENSE		1,006.00	1,006.94
7/26/2022	(1,006.00)				SUSPENSE		(1,006.00)	0.94
7/26/2022	1,006.00		7/1/2022		PAYMENT		1,005.06	0.94
7/26/2022					SUSPENSE		0.94	1.88
8/30/2022	1,006.00				SUSPENSE		1,006.00	1,007.88
8/31/2022	(1,006.00)				SUSPENSE		(1,006.00)	1.88
8/31/2022	1,006.00		8/12/2022		PAYMENT		1,006.00	1.88
10/3/2022	1,006.00				SUSPENSE		1,006.00	1,007.88
10/4/2022	(1,006.00)				SUSPENSE		(1,006.00)	1.88
10/4/2022	1,006.00		9/1/2022		PAYMENT		1,006.00	1.88
10/31/2022	1,006.00				SUSPENSE		1,006.00	1,007.88
11/1/2022	(1,006.00)				SUSPENSE		(1,006.00)	1.88
11/1/2022	1,006.00		10/1/2022		PAYMENT		1,005.06	1.88
11/1/2022					SUSPENSE		0.94	2.82
11/29/2022	1,006.00		11/1/2022		PAYMENT		1,006.00	2.82
1/4/2023	1,006.00				SUSPENSE		1,006.00	1,008.82
1/25/2023	176.91				SUSPENSE		176.91	1,185.73
2/3/2023	(1,021.77)				SUSPENSE		(1,021.77)	163.96
2/3/2023	1,021.77		12/1/2022		PAYMENT		1,021.77	163.96
2/3/2023	1,006.00				SUSPENSE		1,006.00	1,169.96
2/28/2023	1,006.00				SUSPENSE		1,006.00	2,175.96
2/28/2023	(1,021.77)				SUSPENSE		(1,021.77)	1,154.19
2/28/2023	1,021.77		1/1/2023		PAYMENT		1,021.77	1,154.19

Loan Number

3/29/2023	1,006.00				SUSPENSE		1,006.00	2,160.19
3/29/2023	(1,021.77)				SUSPENSE		(1,021.77)	1,138.42
3/29/2023	1,021.77		2/1/2023		PAYMENT		1,021.77	1,138.42
5/2/2023	1,006.00				SUSPENSE		1,006.00	2,144.42
5/2/2023	(1,021.77)				SUSPENSE		(1,021.77)	1,122.65
5/2/2023	1,021.77		3/1/2023		PAYMENT		1,021.77	1,122.65
6/7/2023	(1,021.77)				SUSPENSE		(1,021.77)	100.88
6/7/2023	1,021.77		4/1/2023		PAYMENT		1,021.77	100.88
6/8/2023	1,006.00				SUSPENSE		1,006.00	1,106.88
6/8/2023	(1,033.34)				SUSPENSE		(1,033.34)	73.54
6/8/2023	1,033.34		5/1/2023		PAYMENT		1,033.34	73.54
Next Post-Petition Due Date			6/1/2023					
BKR Chapter	13							

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Eileen M. Bowers

Debtor(s)

BK NO. 22-11231 AMC

Chapter 13

MIDFIRST BANK

Movant

Related to Claim No. 6-2

vs.

Eileen M. Bowers

Debtor(s)

Kenneth E. West,

Trustee

CERTIFICATE OF SERVICE

RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT

I, Denise Carlon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 29, 2023, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Eileen M. Bowers
1630 Horace Court
Bensalem, PA 19020

Attorney for Debtor(s) (via ECF)

Paul H. Young, Esq.
Young, Marr, Mallis & Deane, LLC
3554 Hulmeville Road, Suite 102
Bensalem, PA 19020

Trustee (via ECF)

Kenneth E. West
Office of the Chapter 13 Standing Trustee
1234 Market Street - Suite 1813
Philadelphia, PA 19107

Method of Service: electronic means or first-class mail.

Dated: June 29, 2023

/s/ Denise Carlon

Denise Carlon Esquire
Attorney I.D. 317226
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
201-549-2363
dcarlon@kmlawgroup.com